



Complaints Handling Policy - AllianceBernstein (Europe) Limited

Introduction

This document summarises the arrangements for AllianceBernstein Europe Limited ("ABEL") that apply to the conducting of the Markets in Financial Instruments Directive II ("MiFID II") activities in relation to complaints made by clients and potential clients of ABEL.

ABEL is authorised and regulated by the Central Bank of Ireland ("CBI"). References to relevant rules include the CBI's individual rules and the MiFID II regulations, where applicable and any other rules that may apply to ABEL from time to time.

Applicable Regulation

MiFID II sets out its complaints handling rules in Article 16(2) of Directive 2014/65/EU. It states that investment firms shall:

1. Establish policies and procedures for the prompt handling of clients' complaints;
2. Keep a record of the complaints received and the measures taken for their resolution, and publish the details of the process to be followed when handling a complaint;
3. Establish a complaints management function responsible for the investigation of complaints,
4. Communicate in plain language with clients when handling a complaint;
5. Communicate the firm's position on the complaint to clients and inform the clients about their options, including referring them to an alternative dispute resolution entity;
6. Provide information on complaints and handling to the relevant competent authorities, and the alternative dispute resolution entity; and
7. Analyse complaints and handling data to ensure that they identify and address risks or issues.

Approach

ABEL takes pride in providing high quality professional services to all our clients. However, we realise that there may be occasions when we fall below our high standards. It is ABEL's policy that all client complaints should be treated fairly, consistently and promptly using due skill, care and diligence. The aim of dealing with complaints is to resolve the issues raised by the client as well as identifying and resolving any system and control weaknesses.

Once a complaint has been received, ABEL shall:

1. Investigate the complaint completely, diligently and impartially, obtaining additional information as necessary.
2. Assess fairly, consistently and promptly:
 - a. The subject matter of the complaint;
 - b. Whether the complaint should be upheld;
 - c. What remedial action or redress (or both) may be appropriate; and
 - d. If appropriate, whether it has reasonable grounds to be satisfied that another respondent may be solely or



jointly responsible for the matter alleged in the complaint,

3. Comply promptly with any offer of remedial action or redress accepted by the complainant.

Definition of a complaint

A complaint is defined as any oral or written expression of dissatisfaction, whether justified or not, from, or on behalf of, a person about the provision of, or failure to provide, a financial service or a redress determination.

In this regard it is likely that the client has suffered, or may suffer, financial loss, material distress or material inconvenience and relates to an activity of ABEL, or of a third party with whom ABEL has some connection, in the marketing or provision of financial services or products.

Complaint Handling Process

Should a client wish to register a complaint, they may do so free of charge.

Any concerns can be addressed in writing to :

- Address: Alliance Bernstein (Europe) Limited, Suite 107, 3-8 Hume Street, Dublin 2, D02 C624, Ireland
- Email: AB-Europe@alliancebernstein.com

or verbally to the relevant Sales advisor.

All complaints will be independently investigated by ABEL's Compliance team. The investigation will be considered impartially, effectively and without undue delay depending on the nature and complexity of the complaint.

When handling a complaint, ABEL will communicate with clients or potential clients clearly, in plain language that is easy to understand and shall reply to the complaint without undue delay.

Consideration will be given to individual clients needs as appropriate. For, example a particular life event or a physical disability.

ABEL will communicate its position on the complaint to the client or potential client and inform them about their options, including that they may be able to refer the complaint to an alternative dispute resolution entity or that the client may be able to take civil action.

On receipt of a client's complaint, ABEL will:

1. Send the complainant a prompt written acknowledgement providing early reassurance that ABEL has received the complaint and is dealing with it; and
2. Ensure the complainant is kept informed thereafter of the progress of the measures being taken for the complaint's resolution.

ABEL will endeavor to resolve a complaint within **three business** days following the day on which it was received and if we are able to satisfy the client's concerns, a "summary resolution communication" letter will be sent confirming that the complaint has been resolved.

However, should the client subsequently decide that they are dissatisfied with the resolution they may be able to refer their complaint to the Financial Services and Pensions Ombudsman ("FSPO"), depending on whether they meet the eligibility criteria. This is intended to give consumers and traders access to out-of-court schemes that can help settle contractual disputes that arise out of the purchase and sale/supply of goods or services.

Alternatively, if the client's complaint requires further investigation to make a determination, ABEL will send a written



acknowledgement within five **business days** of receipt of the complaint together with this Complaints Handling Policy and details of the FSPO service.

ABEL aims to resolve all complaints within **four weeks** and provide a final response within **eight weeks**. If ABEL is unable to issue a final response within **eight weeks**, the complainant will be sent a letter giving the reasons for the delay and an indication when ABEL expects to be able to send a final response.

The final response should adequately address the subject matter of the complaint and where the complaint is upheld, ABEL will offer appropriate redress or remedial action.

This final explanation shall include a copy of the FSPO's standard explanatory leaflet as well as the website of the FSPO, informing the complainant that if they are still dissatisfied with the response, they may now be referred to the FSPO, depending on whether they meet the eligibility criteria, or take legal action.

ABEL maintains records of complaints and their resolution in accordance with our internal record retention policies and other applicable policies.

Details of any complaints received will be included in regular quarterly reporting from ABEL's Compliance Officer to the ABEL Board, who will remain apprised of progress through to resolution.

Version Control

Version	Author	Effective Date
1.0	Compliance	9 th July 2024
2.0	Compliance	12 th September 2025